



**Written submission from
Annie Gelfand**

**Mémoire de
Annie Gelfand**

In the Matter of the

À l'égard de

**BWXT Nuclear Energy Canada Inc.,
Toronto and Peterborough Facilities**

**BWXT Nuclear Energy Canada Inc.,
installations de Toronto et Peterborough**

Application for the renewal of the licence for
Toronto and Peterborough facilities

Demande de renouvellement du permis pour les
installations de Toronto et Peterborough

Commission Public Hearing

Audience publique de la Commission

March 2 to 6, 2020

Du 2 au 6 mars 2020

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Filed by email on January 19, 2020

To : CNSC

Re: 10 year licence request by BWXT to process uranium into fuel pellets in the city of Peterborough.

We request the licence not be granted.

Here are just a few of the reasons we urge you to **NOT** to grant a licence to BWXT to process uranium for pelleting, a most toxic element, in our city of Peterborough:

- Accidents happen! There are absolutely no guarantees of accidents not happening! Risking making our city vulnerable by allowing the processing of nuclear fuels in a residential area is totally unacceptable; it poses a grave and long term threat - especially to all our children.

-This licence to process cannot guarantee zero leakage. There is always some radio-active leakage! There are no guarantees of totally eliminating all leakage during processing. Minimizing radio-active dust leakage is not a possible option within a city, especially with the particularly vulnerable children housed in schools nearby and their long term future.

- Toxic buildings abandoned by a previous industry do not make it a qualifier for another toxic industry to move in. There is an ethical and moral limit to living with toxicity in our city of Peterborough, after many concerns expressed through the decades that were not actioned. The city block location being considered and partly occupied by BWXT already has a historical problem of toxicity that has not been resolved. It still tarnishes Peterborough's reputation as a partly toxic city. The people of Peterborough say ENOUGH!

- Transportation logistics pose more problems due to possibility of accidents caused by the moving of fuel and equipment and possible human error. Even sending by rail, a much safer option, is risky transportation for toxic chemicals as many operational and human error accidents still occur, for instance the Lac Magentic catastrophe.

- There is mention of moving all operations of pelleting by BWXT from Toronto to Peterborough after the licence is granted. This is a licence waiting to be granted, so expansion of pelleting can be realized. So, more toxicity is part of the eventual plan. The business plan submitted by BWXT should be scrutinized thoroughly and vetted for their expansion goals.

- There is an explosive risk associated with the quantity of hydrogen needed to be stored in the industrial facility location. There is no way to guarantee of a mishap occurring with no explosion! After the accident, **due to human error**, of the Toronto Sunrise propane filling station located in Downsview, it became immediately apparent that such a facility should not have been allowed to exist any longer in a densely populated city.

- BWXT likely has inadequate liability insurance due to accidents and transgressions, is also an issue worthy of concern, in dealing with toxic chemicals.

- Property market values in our city are finally on the upswing due to GTA population spillover, Highway 407 implementation just completed, Lift Locks being a national heritage site, growth in municipal tax revenues and quality of life together with the beauty of our city are tangible benefits of our vibrant city - not to be undermined by bringing in the proposed nuclear fuel processing. People of Peterborough are most concerned by the granting of this licence or any other related licences for toxic chemical processing in the city!

- We, as humanity, are already living with the effects of the nuclear accidents that have already occurred all around our precious planet! These accidents have caused much grieving and untold suffering for the many permanently affected families! Locally, nuclear processing has crippled the town of Port Hope for decades and the costly major cleanup will likely take another decade, maybe more. There are still issues involved regarding the safety of processing nuclear materials, making it a constant danger or threat to every living thing in its vicinity! Nuclear processing is just too dangerous for a city to consider permitting within its boundaries. We have the second largest country, so why process a deadly chemical within any vibrant Canadian city?

- Even if the population of Peterborough accepts living in hazmat suits, including our children, through a referendum, then it would still be a very risky situation because of the hydrogen explosive danger mentioned above, that make the hazmat suit totally inadequate.

In closing, here are very important questions:

- What safety regulations and data prove that nuclear processing is totally without any risk to our city's people, and especially our children in the long term? -Furthermore, what safety measures and regulations will eliminate dangers posed by other chemicals used in the process, such as hydrogen?

-How will the above be monitored to ensure maximum safety and accountability? Will BWXT liability insurance be adequate in case of an accident or transgression?

We humbly request to be assured, through our Access to Information right, that all the pertinent details that ensure our safety in all aspects of BWXT's operation are being properly addressed, before granting any licence to process uranium for pelleting in our city. Their request for a ten year licence is not sensible for the aforementioned reasons.

Thank you for requesting the city of Peterborough's public feedback before granting a 10 year licence to BWXT.

Sincerely,
Annie Gelfand

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Peterborough, Ontario.